

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No.: 1:15-cr-00149

FRANK R. PARLATO, JR., and
CHITRA V.SELVARAJ,

Defendants.

NOTICE OF PETITION

NATURE OF ACTION:	Criminal.
MOVING PARTY:	Defendant, Frank R. Parlato, Jr.
DATE AND TIME:	To be determined by the Court.
PLACE:	Hon. Richard J. Arcara, United States District Judge, United States Courthouse, 2 Niagara Square, Buffalo, New York 14202.
SUPPORTING PAPERS:	Declaration of Vincent T. Parlato, Executed February 7, 2024, with exhibits and Petitioner's Memorandum of Law.
ANSWERING PAPERS:	If any, absent an Order of the Court, are due at least 14 days after service pursuant to Loc. R. Crim. P. 12 (b)(2).
REPLY PAPERS:	Petitioner requests the opportunity to submit reply papers.

RELIEF REQUESTED:

An Order directing disclosure of grand jury witness, Clare Bronfman's grand jury testimony transcript, taken on or about June 23, 2011, to Petitioner's counsel for use in a judicial proceeding.

GROUND FOR RELIEF:

Federal Rule of Criminal Procedure 6(e)(3)(E)(i) and the authorities cited in Petitioner's attached Memorandum of Law.

ORAL ARGUMENT:

Requested.

Dated: February 7, 2024

VINCENT T. PARLATO, ESQ.

/s/ Vincent T. Parlato

Attorney for Petitioner

403 Main Street, Suite 727

Buffalo, New York 14203

716-430-8858

Vincent.Parlato@buffalonylegal.com

To: United States Attorney's Office
For the Western District of New York
138 Delaware Avenue
Buffalo, New York 14202
(via CM/ECF)

William F. Savino, Esq.
Woods Oviatt Gilman LLP
*Attorneys for Clare Bronfman
and Sara Bronfman*
1900 Main Place Tower
350 Main Street
Buffalo, New York 14202
wsavino@woodsoviatt.com
(Via Email)